

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UMG RECORDINGS, INC., CAPITOL  
RECORDS, LLC, SONY MUSIC  
ENTERTAINMENT, ARISTA MUSIC,  
ARISTA RECORDS, LLC, ATLANTIC  
RECORDING CORPORATION, RHINO  
ENTERTAINMENT COMPANY, WARNER  
MUSIC INC., WARNER MUSIC  
INTERNATIONAL SERVICES LIMITED,  
WARNER RECORDS LLC, and WARNER  
RECORDS/SIRE VENTURES LLC,

Plaintiffs,  
vs.

UNCHARTED LABS, INC., d/b/a Udio.com,  
and JOHN DOES 1-10,

Defendant.

Case No. 1:24-cv-04777 (AKH)

**PLAINTIFFS' NOTICE OF  
MOTION FOR CLARIFICATION**

**TO THE COURT AND ALL PARTIES:**

**PLEASE TAKE NOTICE** that on a date and time to be designated by the Court, in Courtroom 14D of the United States District Court for the Southern District of New York located at 500 Pearl Street, New York, New York 10007, before the Honorable Alvin K. Hellerstein, United States District Judge for the Southern District of New York, Plaintiffs UMG Recordings, Inc.; Capitol Records, LLC; Sony Music Entertainment; Arista Music; Arista Records, LLC; Atlantic Recording Corporation; Rhino Entertainment Company; Warner Music Inc.; Warner Music International Services Limited; Warner Records LLC, and Warner Records/SIRE Ventures LLC will move the Court for clarification of the Court's April 8, 2025 Order regarding production of deposit copies of the sound recordings at issue.

This motion is made and based on this Notice, the Memorandum of Law in Support of the Motion for Clarification, and the Declaration of Rajan S. Trehan in Support of the Motion for Clarification, filed concurrently herewith, the pleadings and papers filed herein, including any reply papers filed by Plaintiffs, on any oral argument that the Court may desire to consider, and on any such other evidence and argument that the Court may choose to consider.

Dated: April 22, 2025

Respectfully submitted,

**HUESTON HENNIGAN LLP**

/s/ Rajan S. Trehan

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*LLC, Atlantic Recording Corporation, Rhino*  
*Entertainment Company, Warner Music Inc.,*  
*Warner Music International Services Limited,*

*Warner Records Inc., Warner Records LLC, and  
Warner Records/SIRE Ventures LLC*